

Gene D. Vorobyov  
CA Bar # 200193  
2309 Noriega Street, # 46  
San Francisco, CA 94122

Attorney for Defendant  
SHAWN MICHAEL CONLEY

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAWN MICHAEL CONLEY,

Defendant.

Case No.: 2:03-cr-00371-JAM-8

**Amended Stipulation About  
Briefing Schedule for the  
Government's Response and  
Conley's Reply Brief in Support  
of the Motion to Vacate or  
Reduce Conley's Sentence, 18  
U.S.C. § 3582(c)(1)(A); Order**

///

///

///

///

///

**Stipulation**

The parties, through their respective counsel of record, stipulate to the following briefing schedule for the Government's response to Conley's motion to vacate or reduce sentence (docket entry 1242) and Conley's reply brief in support of the motion. The Government's response is now due October 24, 2022, and Conley's reply brief is due October 31, 2022.

The stipulation was proposed by the defense based on counsel anticipating a time conflict with the existing schedule (an opening brief deadline in a state appellate matter, oral argument in another state appellate matter, and counsel's outpatient eye procedure scheduled for October 25, 2022).

The Government does not oppose the request. The Government also would need additional time to prepare a response in order to obtain documents from the Bureau of Prisons.

///

///

///

///

///

///

1 In light of the above, the parties stipulate and jointly request that the  
2 Court amend the remaining briefing schedule, as follows. The Government's  
3 response to the motion would be due November 30, 2022. Conley's reply brief  
4 would be due December 9, 2022.  
5

6 DATE: October 20, 2022

By:

9 s/ Gene D. Vorobyov  
10 Attorney for Defendant  
11 SHAWN CONLEY

12 Date: October 20, 2022

By:

14 s/ Jason Hitt  
15 Assistant U.S. Attorney

16 **Order**

17 Based on the stipulated facts described in the proposed order, the Court  
18 finds good cause and grants the request to amend the briefing schedule.

19 The Government's response to the motion to vacate or reduce the sentence is  
20 due November 30, 2022. Conley's reply brief in support of the motion is due  
21 December 9, 2022.  
22

23 IT IS SO ORDERED.  
24

25 Date: October 24, 2022 /s/ John A. Mendez

26 THE HONORABLE JOHN A. MENDEZ  
27 SENIOR UNITED STATES DISTRICT JUDGE  
28